



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

PP
F. #2021R00019

271 Cadman Plaza East
Brooklyn, New York 11201

August 1, 2023

By ECF

The Honorable Dora L. Irizarry
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Quandelle Joseph
Criminal Docket No. 23-306 (DLI)

Dear Judge Irizarry:

The government writes to respectfully request that the attached proposed stipulation concerning discovery materials be so ordered by the Court. The government makes this application for two reasons. First, there are discovery materials to be produced to the defendant that contain Personal Identifying Information and the proposed stipulation will enable expedited production of those materials. Second, because the government's investigation is ongoing, unrestricted disclosure of certain material could jeopardize that investigation, including by alerting other targets of the investigation. A proposed stipulation, which has been signed and agreed to by the government and defense counsel, is respectfully enclosed for the Court's consideration.

Respectfully submitted,

BREON PEACE
United States Attorney

By: _____ /s/
Philip Pilmar
Sara Winik
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(718) 254-6106

cc: Clerk of the Court (FB) (By ECF)
Counsel of Record (By ECF)